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**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DIVISION OF TEXAS
SHERMAN DIVISION**

IN RE:	}	
	}	
ROBERT EDWIN JACOBSEN,	}	CASE NO. 07-41092-R
	}	
	}	CHAPTER 7
	}	
DEBTOR.	}	

**MOTION TO REQUIRE CHAPTER 7
TRUSTEE TO ABANDON REAL PROPERTY**

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT, AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY (20) DAYS FROM THE DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH RESPONSE. IF NO RESPONSE IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF A RESPONSE IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. THE COURT RESERVES THE RIGHT TO SET A HEARING IN ANY MATTER.

**TO THE HONORABLE JUDGE BRENDA T. RHOADES,
U.S. BANKRUPTCY JUDGE:**

COMES NOW Robert Edwin Jacobsen, the Debtor in the above-styled and numbered case and files this his Motion to Require Chapter 7 Trustee to Abandon Real Property and in support of same would show the Court as follows:

1. This Court has jurisdiction over this Motion pursuant to 11 U.S.C. Sections 1334 and 157.
2. The Debtor has scheduled the following real property as part of the bankruptcy case:

House Address	Value Per Schedules Dated 3/13/08	Secured Debt Per Schedules	Equity per Schedules	Closing Costs at 8% Equity after closing costs	Realtor's Sales Comps	Tax Value 2008	Equity on Realtor's Comps
7804 Steppington Dr. Plano, Texas	144,000	143,427	573	-10,947	79.73 at 1758= 140,165	154,237	-3,262
3921 Acklin Drive Plano, Texas	165,000	171,516	-6,516	-19,716	88.66 at 1820= 161,361	192,861	-10,155
1318 Normandy Lane Allen, Texas	145,000	143,711	1,289	-10,311	75.14 at 1801= 135,327	151,879	-8,384
1309 Cassandra Lane Allen, Texas	156,653	154,716	1,937	-10,595	73.25 at 1931= 141,445	163,205	-13,271

None of the above-mentioned properties have equity in them for the estate. In fact the only value to the estate in these properties is through a manipulation or cramdown arrangement with the secured lenders. Such arrangement would clearly penalize the non-debtor liable on the mortgages and the tenants who occupy such properties under lease

agreements. The value of such properties is only being further eroded by the lack of the payment of the mortgages on the properties, the taxes and the insurance.

3. Because of the lack of equity in the properties and the potential of harm to third parties from delaying such abandonment the Debtor urges the Court to abandon the real property and associated rents.

WHEREFORE PREMISES CONSIDERED Debtor prays the Court grant this Motion and for such other and further relief to which the Debtor may show himself entitled.

DATE May 13, 2008

Respectfully submitted,

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**By: /s/ Joyce W. Lindauer
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CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2008 a true and correct copy of the foregoing document was sent by first class, United States mail to those persons on the attached Service List and was served by electronic filing on the Office of the U.S. Trustee, Chapter 7 Trustee and counsel for the Chapter 7 Trustee on May 13, 2008.

/s/ Joyce W. Lindauer
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